

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	M.B.D. Case No.
)	
SEAN BROWN,)	
)	
Defendant)	

**MOTION FOR ENDS-OF-JUSTICE CONTINUANCE OF TIME
FOR FILING AN INDICTMENT OR INFORMATION, AND
EXCLUSION OF TIME, UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through Assistant United States Attorney Michael Crowley, with the agreement of counsel for Defendant Sean Brown, respectfully moves this Court to grant a continuance of the time within which an indictment or information must be filed, and exclude the time period from April 22, 2025, through and including May 29, 2025, from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. §§3161(h)(7)(A), and Sections 5(b)(7)(B) and 5(c)(1)(A) of the *Plan for Prompt Disposition of Criminal Cases* for the United States District Court for the District of Massachusetts (effective December 2008), on the ground that the ends of justice served by granting the requested continuance and excluding these periods outweigh the best interests of the public and the defendants in a speedy trial. The parties further ask this Court to issue the attached proposed *Order of Continuance and Excludable Delay*. In support of this request, the parties state as follows:

1. The parties are involved in discussions regarding the possible resolution of this matter (which was initiated against the defendant by a criminal complaint in *United States v. Brown*, Case No. 25-mj-07082-JCB) that might result in a guilty plea that would obviate the need for an indictment. In this regard, the parties need additional time to review a potential plea resolution. The

government will produce initial discovery for the defendant to review in conjunction with ongoing discussions regarding a potential resolution of the case.

2. The requested exclusion of time will permit (1) counsel for the defendant to adequately confer with the defendant regarding the case, including reviewing initial discovery in the case, and (2) allow the parties to discuss a potential resolution of the case before the government is required to seek an indictment. Such an agreement, in conjunction with a pre-indictment plea, may work to the defendant's benefit. The parties agree that, if the requested time is excluded, the government has until May 29, 2025, to return an indictment in this case. This is the first such request. A proposed order is attached.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By: /s/ Michael J. Crowley
Michael J. Crowley
Assistant U.S. Attorney

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

By: /s/ Michael J. Crowley
Michael J. Crowley
Assistant U.S. Attorney

Date: April 21, 2025